

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

2013 DEC -3 A 11: 23

JON A. SANFILIPPO
CLERK

13-C-1361

Case No. _____
(Supplied by Clerk)

Dasha Bridgette King)
1818 E Shorewood Blvd)
#113)
Shorewood, WI 53211)

(Full Name of Plaintiff or Plaintiffs)

vs

Greg Brown)
Motorola Solutions, Inc.)
303 E. Algonquin Road)
Schaumburg, IL 60196)
(Full Name of Defendant or Defendants)

COMPLAINT

I. PREVIOUS LAWSUITS

- A. Have you begun other lawsuits in state or federal court relating to the same occurrence involved in this action?
☐ YES ☒ NO
- B. Have you begun other lawsuits in state or federal court?
☐ YES ☒ NO
- C. If your answer to A or B was YES, provide the requested information below. If there is more than one lawsuit, describe each additional one on a separate sheet of paper, using the same outline.

1. Parties to the previous lawsuit

Plaintiff(s) _____

Defendant(s) _____

2. Court in which lawsuit brought (if federal court, name district: if state court, name the county)

3. Docket number _____
4. Current status (for example: Was the case dismissed? Was it appealed? Is it still pending)?

5. Approximate date of filing lawsuit _____
6. Approximate date of disposition _____

II. PARTIES

A. Your name (PLAINTIFF) Dasha Bridgette King

B. Your Address and Phone Number 1818 E. Shorewood Blvd # 113
414-484-1271

(If there is more than one plaintiff, use the margin for extra space if you need it. List the address only if it is different from the address listed above).

C. DEFENDANT (name) Greg Brown

D. Defendants address Motorola Solutions, Inc.
1303 East Algonquin Road; Schaumburg, IL 60196

E. Additional DEFENDANTS (names and addresses) _____
External Relations Intellectual Property Section
Law Department
1303 East Algonquin Road; Schaumburg IL 60196

III. STATEMENT OF CLAIM (follow instructions carefully)

State briefly as possible the *essential facts* of your case. Tell what each defendant did to you that caused you to file this suit against them. If you are complaining about more than one wrong, use a separate **numbered** paragraph for each wrong, and describe each wrong in that paragraph and only that paragraph. State only the facts. *Do not give any legal theories or arguments, do not cite any cases or statutes. Do not feel you have to use all the space.* USE NO MORE THAN THE SPACE PROVIDED. THE COURT STRONGLY DISAPPROVES OF STATING CLAIMS OUTSIDE THE SPACE PROVIDED.

Begin statement of claim: Breach of Contract

I submitted an idea, which is an original creation on two occasions to Greg Brown of Motorola Solutions Inc. The first time that I submitted my idea to ~~Greg~~^{OK} Greg Brown of Motorola Solutions, Inc. was on May 2, 2011. The second time that I submitted my idea to Greg Brown of Motorola Solutions, Inc. was on July 1, 2013. On August 19, 2013 I received an email from Motorola Solutions External Relations Law Department advising me to sign their agreement [The policy of Motorola Solutions, Inc. On Ideas Submitted By Persons Outside The Company And Agreement With The Conditions Under Which Submitted]. I was also advised to "return one copy of the agreement along with any information, including patent number if applicable..." I was excited and therefore read the agreement very thoroughly and filled ~~it~~^{OK} it out thoroughly, and emailed - and - mailed a copy of the agreement to Motorola Solutions External Relations and myself. I still have the email that I sent to myself as well as the still sealed contract/agreement that I was prompted to sign on August 19, 2013.

On September 30, 2013 I received an email from Motorola Solutions External Relations advising me that

STATEMENT OF CLAIM-Continued

"Motorola Solutions is not interested in pursuing this idea [with you] at this time." I understood and respected Motorola Solutions' decision; therefore their decision is not what I had an issue with. What I took issue in is the fact that, afterwards I decided to check the Motorola Solutions website and noticed that my idea/original creation was in fact being used and being advised (and sold) on their website. Therefore I immediately ~~contacted~~ Greg Brown (whom I originally submitted my idea to twice), and Motorola Solutions External Relations to advise them that their Kiosks, especially the MK3100 Kiosk, is my idea/original creation, and that the company has therefore breached their own contract since it promises the following: "We do not require that the submitter obtain, or even to have applied for, a patent on an idea before submitting the idea. If a disclosure is made under the conditions recited herein, and the company is interested thereafter in further considering the idea, negotiations will be undertaken to try to arrive at terms which are equitable to both parties and will take care of the needs of the particular situation." The MK3100 Kiosk (along with other Kiosks manufactured after I submitted my idea on May 2, 2011) includes a

STATEMENT OF CLAIM-Continued

picture of a high heel shoe, ~~wh~~^{dk} and under the shoe, the sizes (within the store's inventory) are listed. Their first attorney, John Amberg, even verified dates that are months after the submission of my idea/original creation to Greg Brown of Motorola Solutions, Inc. Motorola Solutions never negotiated nor compensated me for them using my idea (per what their agreement states).

Libel

After attempting to have my questions answered by their first attorney John Amberg, I was told not to ~~contact~~^{dk} contact him nor Motorola Solutions anymore. Since I was confused and wanted my questions answered I contacted the office of Greg Brown ~~at~~^{dk} via phone and via email. I spoke to an individual on October 28, 2013 and ^{was} promised that I'd receive a call back from John Amberg their attorney. Instead I was emailed a cease and Desist Letter from Mark L. ~~Dub~~^{dk} Durbin of Barnes and Thornburg LLP. The company ~~unl~~^{dk} accuses me of: 1) harassment; 2) intimidation; 3) attempted extortion; 4) sending emails that I did not send; 5) (saying that my idea was not a novel one. All are ~~unet~~^{dk} untrue and affects me going forward

IV. RELIEF YOU REQUEST

State exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes. DO NOT USE THIS SPACE TO STATE THE FACTS OF YOUR CLAIM. USE IT ONLY TO REQUEST REMEDIES FOR THE INJURIES YOU COMPLAIN ABOUT. Use only the space provided. The court strongly disapproves of requesting remedies outside the space provided.

To be compensated for my idea in regards to Motorola Solutions, Inc breaching their own contract

To be compensated for their slander against me and the pain and suffering it caused (punitive damages).

For the company to cease from marketing/profitting from my idea (via their website) until compensation is negotiated.

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 3 day of December, 2013.

Dasha King

(Signature of Plaintiff(s))